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Attorneys for Defendant
CHICAGO TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COMMUNITY LOAN SERVICING, LLC
FKA BAYVIEW LOAN SERVICING, LLC,

Plaintiff,

VS.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 3:21-cv-00154-MMD-WGC

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 12] AND MOTION FOR FEES
AND COSTS [ECF No. 13]**

(Second Request)

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Community Loan Servicing, LLC fka Bayview Loan Servicing, LLC (“Bayview”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On March 8, 2021, Bayview filed its Complaint in the Second Judicial District Court, Case No. CV21-00397 [ECF No. 1-1];
2. On April 5, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On May 5, 2021, Bayview filed a Motion for Remand [ECF No. 12] and Motion for Costs and Fees [ECF No. 13];
4. On May 19, 2021, the Court granted the parties' request to extend the deadline for Chicago Title to respond to Bayview's Motion for Remand and Motion for Costs and Fees;
5. Chicago Title's deadline to respond to Bayview's Motion for Remand and Motion for Costs and Fees is June 18, 2021;
6. Chicago Title's counsel is requesting an extension until July 9, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests another extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in Bayview's motions;
8. Bayview does not oppose the requested extension;
9. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Bayview's Motion
2 for Remand [ECF No. 12] and Motion for Costs and Fees [ECF No. 13] is hereby extended
3 through and including July 9, 2021.

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5 Dated: June 16, 2021

6 EARLY SULLIVAN WRIGHT
7 GIZER & MCRAE LLP

8 By: /s/-- Sophia S. Lau
9 SCOTT E. GIZER
10 SOPHIA S. LAU
11 Attorneys for Defendant CHICAGO TITLE
12 INSURANCE COMPANY

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14 Dated: June 16, 2021

15 SINCLAIR BRAUN LLP

16 By: /s/-Kevin S. Sinclair
17 KEVIN S. SINCLAIR
18 Attorneys for Defendant CHICAGO TITLE
19 INSURANCE COMPANY

20

21 Dated: June 16, 2021

22 WRIGHT FINLAY & ZAK, LLP

23 By: /s/-Darren T. Brenner
24 DARREN T. BRENNER
25 Attorneys for Plaintiff COMMUNITY LOAN
26 SERVICING, LLC FKA BAYVIEW LOAN
27 SERVICING, LLC

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1 **IT IS SO ORDERED:**

2 Dated: June 17, 2021

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1 By: 
2 UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ D'Metria Bolden
D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP